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Attorneys for Defendants County of Sonoma (also sued as Sonoma County
Sheriff's Department), Bill Cogbill, Lewis Lincoln, Daniel Cortez and Eduardo Espino

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

ERIC JAMES BAKER,

No. CV 08 3433 EDL

Plaintiff,

v.

**STIPULATION TO VACATE PRETRIAL
CONFERENCE PENDING DISMISSAL
OF ACTION; PROPOSED ORDER
THEREON**

SONOMA COUNTY SHERIFF'S
DEPARTMENT, et al.,

Defendants.

The parties to this action, by and through their respective counsel of record, hereby stipulate
to all of the following:

1. The parties anticipate that dismissal of the case with prejudice will be filed within ten (10)
days;
2. The vacating of the pretrial conference set for June 8, 2010, will promote the efficient use
of the Court's time pending the filing of the papers requesting the entry of dismissal;
3. The parties agree to diligently prepare and finalize all papers necessary in order to file the
dismissal within the time above stated.

SO STIPULATED.

1 DATED: June 3, 2010

SANFORD WITTELS & HEISLER, LLP

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3 By: _____/s/_____
Thomas M. Litton, Esq.
Attorneys for PLAINTIFF

6 TRIMBLE, SHERINIAN & VARANINI

7
8 By: _____/s/_____
JEROME M. VARANINI, ESQ.
Attorneys for Defendants CALIFORNIA
9 FORENSIC MEDICAL GROUP, INC. and
JAMES LUDERS, M.D.

12 SENNEFF FREEMAN & BLUESTONE, LLP

13
14 By: /s/ Bonnie A. Freeman-----
Bonnie A. Freeman
Attorneys for Defendants County of Sonoma, Sheriff Bill
15 Cogbill, Correctional Officers Lewis Lincoln, Daniel
16 Cortez and Eduardo Espino

18 [PROPOSED] ORDER

19 GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED that the pretrial
20 conference scheduled for June 8, 2010, is hereby VACATED. The parties are directed to have the
21 dismissal with prejudice of this action filed no later than _____.

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23 Date: _____

24 Hon. Elizabeth D. Laporte

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SENNEFF
FREEMAN
BLUESTONE